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11 Attorneys for PLAINTIFF ROBERT
12 HUNTER BIDEN

13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**
15 **WESTERN DIVISION**

16 ROBERT HUNTER BIDEN, an
individual,

17 Plaintiff,

18 vs.

19 PATRICK M. BYRNE, an individual,

20 Defendant.

Case No. 2:23-cv-09430-SVW-PD

**PLAINTIFF ROBERT HUNTER
BIDEN'S REQUEST FOR
COUNSEL TO APPEAR
REMOTELY FOR SEPTEMBER 29,
2025 HEARING ON PLAINTIFF
ROBERT HUNTER BIDEN'S
MOTION FOR SANCTIONS**

*[Declaration of Richard A. Harpootlian
filed and Proposed Order and filed
concurrently herewith]*

Date: September 29, 2025

Time: 1:30 P.M.

Crtrm.: 10A

Judge: Hon. Stephen V. Wilson

1 **TO THE HONORABLE COURT, ALL PARTIES AND THEIR**
2 **ATTORNEYS OF RECORD**, Plaintiff Robert Hunter Biden (“Plaintiff”) hereby
3 respectfully requests permission from this Court for his Counsel, Richard A.
4 Harpootlian, to appear remotely by way of videoconference (e.g. Zoom) for the
5 hearing. Good cause exists to grant this request because Mr. Harpootlian is unable to
6 be in the State of California on Monday, September 29, 2025, due to the fact that he
7 resides in South Carolina and has professional obligations that prevent him from
8 traveling to California and attending the Hearing in person at that time, for which he
9 received notice on September 15, 2025. Accordingly, Plaintiff respectfully requests
10 that the Court grant this request for Mr. Harpootlian to appear remotely by
11 videoconference at the Hearing.

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13
14 Dated: September 22, 2025

s/Richard A. Harpootlian
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27 *Attorney for Plaintiff*
28 *Robert Hunter Biden*

DECLARATION OF RICHARD A. HARPOOTLIAN

I, Richard A. Harpootlian, declare and state as follows:

1. I am counsel of record for Plaintiff Robert Hunter Biden (“Plaintiff”) in the above entitled action and am over the age of 18. I hereby submit this declaration in support of Plaintiff’s Request for Counsel to Appear Remotely for the hearing scheduled in this case for September 29, 2025, at 1:30 p.m.. If called as a witness, I would and could testify to the matters contained herein.

2. I have prepared for trial and appeared for trial on July 29, 2025. I will be participating as trial counsel in the trial which was rescheduled for October 14, 2025 and therefore my participation at the Hearing is necessary.

2. I received notice on September 15, 2025, of the September 29, 2025 hearing and am unable to be in the State of California on September 29 because I reside in South Carolina and have professional obligations that prevent me from traveling to California and attending the Conference in person.

I declare under penalty of perjury under the laws of the United States of America and the forgoing is true and correct. Executed on this 22st day of September, 2025, at Columbia, South Carolina.

s/Richard A. Harpootlian
Richard A. Harpootlian